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8 *Attorneys for Defendant*
9 *sued as George Dikian*

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 VPN.COM LLC,
13 *Plaintiff,*

14 vs.

15 GEORGE DIKIAN et al.

16 *Defendants.*

CASE NO. 2:22-cv-04453-AB-MAR

**DECLARATION OF MIKE
RODENBAUGH, ESQ. IN SUPPORT
OF DEFENDANT'S MOTION TO
PROCEED UNDER PSEUDONYM**

17 I, Mike Rodenbaugh, am lead counsel in this matter on behalf of Defendant
18 sued as George Dikian. I swear under penalty of perjury that the following
19 statements are true and correct to the best of my knowledge:

- 20 1. Attached as Exhibit A is a true and correct copy of ICANN's SSAC
21 *Report: Domain Name Hijacking*, dated July 12, 2005.
- 22 2. Attached as Exhibit B are true and correct copies of law firm web pages
23 describing their domain name theft recovery services.
- 24 3. Attached as Exhibit C is a true and correct copy of Plaintiff's article
25 published in December 2022 entitled *Domain Name Hijacking, Reverse*
26 *Hijacking, and What To Do If Your Domain Name Is Stolen.*

27
28 Declaration of Mike Rodenbaugh, Esq. ISO
Defendant's Motion to Proceed Under Pseudonym
Case No. 2:22-cv-04453-AB-MAR

- 1 4. Attached as Exhibit D is a true and correct copy of a news article from
- 2 *Ars Technica* entitled “*Failed plot to steal domain name at gunpoint*
- 3 *brings 14 year prison term.*”
- 4 5. Attached as Exhibit E is a true and correct copies of the expert report of
- 5 Rod Rasmussen disclosed to Plaintiff on July 3, 2023.
- 6 6. Attached as Exhibit F is a true and correct copies of the expert report of
- 7 Mark Seiden (redacted) disclosed to Plaintiff on July 3, 2023.
- 8 7. On December 15, 2022, Plaintiff’s counsel forwarded a third-party
- 9 subpoena seeking information about RPI, using RPI’s real name.
- 10 8. On January 31, 2023, Plaintiff named RPI in Plaintiff’s Initial Disclosure.
- 11 9. At least as early as February 27, 2023, Plaintiff received a copy of RPI’s
- 12 former Nevada driver’s license in response to a subpoena to
- 13 Escrow.com,.
- 14 10. On March 3, 2023, Plaintiff’s counsel sent a letter to me stating “we will
- 15 be seeking leave to amend our complaint to ... name [RPI] as a party.”
- 16 11. On May 8, 2023, Defendant signed RPI’s name upon the sworn
- 17 Verification of RPI’s timely responses to Plaintiff’s interrogatories,
- 18 wherein RPI’s real identity was stated in response to Interrogatory #1.
- 19 12. On July 14, 2023, Defendant RPI produced a copy of RPI’s current
- 20 Florida driver’s license to Plaintiff’s counsel, in response to Plaintiff’s
- 21 requests for production.
- 22 13. Plaintiff has sent at least seven third-party subpoenas seeking
- 23 confidential information about RPI, including to Microsoft, Yahoo!,
- 24 RPI’s domain name registrar (Tucows), and RPI’s domain escrow service
- 25
- 26
- 27

(Escrow.com). All companies responded to Plaintiff's subpoenas without objection.¹

14. Attached as Exhibit G is a true and correct copy of the opinion in *Alexander v. Falk*, No. 2:16-cv-02268-MMD-GWF (D. Nev. Aug. 30, 2017).

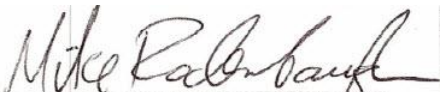
15. Attached as Exhibit H is a true and correct copy of the opinion in *Doe v. Mozer*, No. 2:16-cv-00210-KJD-VCF, at *2 (D. Nev. June 24, 2016).

16. Attached as Exhibit I is a true and correct copy of the opinion in *Discopolus, LLC v. City of Reno*, No. 3:17-CV-0574-MMD (VPC) (D. Nev. Nov. 16, 2017).

RESPECTFULLY SUBMITTED,

DATED: JULY 21, 2023

RODENBAUGH LAW

By: 
Mike Rodenbaugh (SBN 179059)

*Attorneys for Defendant
sued as George Dikian*

¹ Except as to one subpoena subject to Defendant's pending Motion to Quash. C.D. Cal. Case No. 2:23-mc-00087-SPG-KS (subpoena to Bodis LLC).
Declaration of Mike Rodenbaugh, Esq. ISO
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